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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11                   Plaintiff,  
12                   v.  
13 ROBERT CHAVEZ,  
14                   Defendant.  
15

Case No. 3:22-cr-00015-ART-CLB

**ORDER APPROVING  
STIPULATION TO VACATE  
TRIAL DATES**  
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Federal Public  
18 Defender Rene L. Valladares, Assistant Federal Public Defender Rick Mula, counsel for Robert  
19 Chavez, United States Attorney Jason M. Frierson, and Assistant United States Attorney  
20 Randolph St. Clair, counsel for the United States of America, that the video calendar call  
21 currently scheduled for August 15, 2023, at 11:00 a.m., and the trial scheduled for August 22,  
22 2023, at 9:30 a.m., be vacated.

23 The Stipulation to vacate is entered into for the following reasons:

24 1. An evidentiary hearing on Defendant's motions to suppress previously was  
25 scheduled in this case for July 5, 2023, at 11:00 a.m. (ECF No. 54.)  
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1           2.       The parties filed a joint status report on June 30, 2023, noting that Mr. Chavez's  
2 whereabouts were unknown. (ECF No. 68.)

3           3.       The Court vacated the evidentiary hearing after "reviewing and considering  
4 Defendant's absconder status." (ECF No. 69.)

5           4.       The Court directed the parties "to confer regarding the currently scheduled trial  
6 date and file a stipulation or a motion . . . addressing whether to vacate the current trial date and  
7 include a proposed order." (*Id.*)

8           5.       The parties have conferred and agree that the current trial date (and associated  
9 calendar call) should be vacated.

10          6.       The period of delay that will result from this stipulation is excludable in  
11 computing the time within which the trial herein must commence. *See* 18 U.S.C. §  
12 3161(h)(3)(A) (excluding "[a]ny period of delay resulting from the absence or unavailability of  
13 the defendant").

14               This is the first stipulation to vacate filed herein.

15               DATED this 3rd day July, 2023.

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17               RENE L. VALLADARES  
18               Federal Public Defender

              JASON M. FRIERSON  
              United States Attorney

19               /s/ Rick Mula  
20 By: \_\_\_\_\_

21               RICK MULA  
22               Assistant Federal Public Defender  
23               Counsel for Robert Chavez

              /s/ Randolph St. Clair  
By: \_\_\_\_\_

              RANDOLPH ST. CLAIR  
              Assistant United States Attorney  
              Counsel for United States

Case No. 3:22-cr-00015-ART-CLB

**ORDER**

DATED this 5th Day of July, 2023.

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